

EXHIBIT A

WEIK, NITSCHE & DOUGHERTY, LLC

ATTORNEYS AT LAW

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Joel H. Fredricks*

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Bear, DE 19701
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33 Deak Drive, Suite 102
Smyrna, DE 19977
(302) 389-4040

Georgetown Office:
Phone (302) 856-9868
By Appointment Only

October 29, 2020

Target Corporation
1650 New Brighton Boulevard
Minneapolis, MN 55413

**SENT VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
RECEIPT #70183090000162175334
AND REGULAR MAIL**

**RE: Elizabeth N. Ochefu v. Target Corporation
Civil Action #N20C-10-125 CLS
My Client: Elizabeth N. Ochefu**

Dear Sir/Madam:

A lawsuit has been filed against you in the Superior Court of the State of Delaware regarding an automobile accident which occurred on 7/13/2019. Enclosed are copies of the Complaint and Plaintiff's Answers to Form 30 Interrogatories which are being served upon you pursuant to 10 Del. C. §3104(d)(3) since you are a non-resident of the State of Delaware.

Please be advised that such service is as effectual to all intents and purposes as if it had been made upon you personally within this State. A response to the lawsuit must be filed within twenty (20) days of the mailing of this letter. **Please notify your liability insurance carrier as soon as possible.**

Thank you for your anticipated cooperation.

Very truly yours,

/s/ Gary S. Nitsche

Gary S. Nitsche, P.A.

GSN/ea
Enclosure
#219-0448-21WS

DICTATED BUT NOT READ

EFiled: Oct 14 2020 10:10AM EDT
Transaction ID 66018944
Case No. N20C-10-125 CLS



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

ELIZABETH N. OCHEFU and)
HASSAN OCHEFU, wife and husband,)
Plaintiffs,)
v.) C. A. No. N20C-
TARGET CORPORATION,) JURY TRIAL DEMANDED
a foreign corporation,)
Defendant.)

SUMMONS

THE STATE OF DELAWARE
TO PLAINTIFFS' COUNSEL
YOU ARE COMMANDED:

To summon the above-named Defendant so that, within 20 days after service hereof upon Defendant, exclusive of the date of service, Defendant shall serve upon Gary S. Nitsche, P.A., Plaintiffs' attorney, whose address is 305 N. Union Street, Second Floor, Wilmington, Delaware 19805 an Answer to the Complaint (and, if an affidavit of demand has been filed, an affidavit of defense).

To serve upon Defendant a copy hereof and of the Complaint (and of the affidavit of demand if any has been filed by Plaintiffs).

Date:

10-21-20

Lisa M. Gonzalez
Chief Deputy Prothonotary

Per Deputy

TO THE ABOVE NAMED DEFENDANT:

In case of your failure, within 20 days after service hereof upon you, exclusive of the day of service, to serve on Plaintiffs' attorney named above an Answer to the Complaint (and, if an affidavit of demand has been filed, an affidavit of defense), judgment by default will be rendered against you for the relief demanded in the Complaint (or in the affidavit of demand, if any).

Lisa M. Gonzalez

Chief Deputy Prothonotary

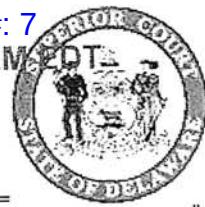
Per Deputy

FILED: Oct 14 2020 10:10AM PDT
SUPERIOR COURT CIVIL CASE INFORMATION STATEMENT (CIS)
Transaction ID 66018944

Case No. N20C-10-125 CLS

COUNTY: (New Castle) Kent Sussex

CIVIL ACTION NUMBER: N20C-



CAPTION:

ELIZABETH N. OCHEFU and HASSAN OCHEFU, wife and husband,

Plaintiffs,

v.

TARGET CORPORATION, a foreign corporation,

Defendant.

Civil Case Code: CPIN

Civil Case Type: Personal Injury

Mandatory Non-Binding Arbitration (MNA)

Name and Status of Party Filing Document:

Elizabeth N. Ochefu and Hassan Ochefu, Plaintiffs

Document Type:(e.g. Complaint, Answer with counterclaim)

Complaint

JURY DEMAND Yes No.

ATTORNEY NAME(S):

GARY S. NITSCHE, P.A.

WILLIAM R. STEWART, III, ESQ.

IDENTIFY ANY RELATED CASES NOW PENDING IN THE SUPERIOR COURT BY CAPTION AND CIVIL ACTION NUMBER INCLUDING JUDGE'S INITIALS

ATTORNEY ID(S):

2617

4980

FIRM NAME:

WEIK, NITSCHE & DOUGHERTY, LLC

EXPLAIN THE RELATIONSHIP(S):

ADDRESS:

305 N. Union Street, Second Floor

P. O. Box 2324

Wilmington, DE 19899

OTHER UNUSUAL ISSUES THAT AFFECT CASE MANAGEMENT:

TELEPHONE NUMBER:

(302) 655-4040

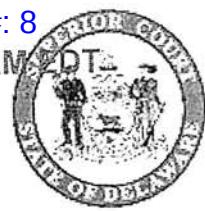
FAX NUMBER:

(302) 654-4892

E-MAIL ADDRESS:

gnitsche@attys4u.com

wstewart@attys4u.com



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

ELIZABETH N. OCHEFU and)
HASSAN OCHEFU, wife and husband,)
)
Plaintiffs,)
)
v.) C. A. No. N20C-
)
TARGET CORPORATION,) JURY TRIAL DEMANDED
a foreign corporation,)
)
Defendant.)

COMPLAINT

1. The Plaintiffs, Elizabeth N. Ochefu and Hassan Ochefu, wife and husband, are residents of the State of Delaware and reside at 32 Leena Lane, Smyrna, Delaware 19977.

2. The Defendant, Target Corporation, is a foreign corporation and conducts business in the State of Delaware at 148 John Hunn Brown Road, Dover, Delaware 19901 and whose corporate headquarters are located at 1650 New Brighton Boulevard, Minneapolis, Minnesota 55413.

3. On or about July 13, 2019, the Plaintiff Elizabeth N. Ochefu was a business invitee on the premises of the Defendant Target Corporation at 148 John Hunn Brown Road, Dover, Delaware 19901.

4. At or about the same time and place, as Plaintiff Elizabeth N. Ochefu was on the premises of the Defendant Target Corporation at 148 John Hunn Brown Road, Dover, Delaware 19901, she attempted to sit in a chair that was retrieved and placed down for her to sit in, by the Defendant's employees, who were acting in the course and scope of their employment as the agent and/or employee of the Defendant. After this employee placed the chair on the ground for her to sit in, suddenly and without warning, the chair collapsed as a result of the negligence of the Defendant, thereby causing Plaintiff to fall with force and violence and sustain personal injuries.

5. The Defendant, through its employees and/or agents, was negligent in that it:
 - (a) Failed to properly and reasonably warn the Plaintiff;
 - (b) Failed to properly and reasonably inspect said chair before permitting Plaintiff to sit in it;
 - (c) Failed to properly secure the chair before having Plaintiff sit in the chair;
 - (d) Failed to properly train and supervise its employees;
 - (e) Failed to properly follow the chair assembly instructions prior to having Plaintiff sit in the chair;

Plaintiff sit in the chair;

- (f) Failed to otherwise exercise reasonable care; and
- (g) As otherwise will be revealed through discovery in the case.

6. Each of the aforementioned acts of negligence of the Defendant's employees and/or agents are attributable to Defendant by reason of the doctrine of *respondeat superior*.

7. Each of the aforementioned acts of negligence of the Defendant constitutes a proximate cause of the incident, Plaintiff's injuries and damages resulting to the Plaintiffs.

8. As a proximate result of the aforesaid negligence of the Defendant, the Plaintiffs have suffered the following injuries and damages:

- (a) Personal injuries all of which may be permanent to Plaintiff Elizabeth N. Ochefu;
- (b) Pain and suffering by Plaintiff Elizabeth N. Ochefu; and
- (c) Medical expenses past and future; and
- (d) Loss of consortium, society, aid and comfort of his wife, Elizabeth N. Ochefu, by her husband Hassan Ochefu.

WHEREFORE Plaintiffs demand judgment against the Defendant for personal injuries, pain and suffering, past and future medical expenses, loss of consortium, plus interest and court costs.

WEIK, NITSCHE & DOUGHERTY, LLC

/s/ Gary S. Nitsche

GARY S. NITSCHE, P.A. (#2617)
WILLIAM R. STEWART, III, ESQ. (#4980)
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Attorneys for Plaintiffs

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)	
Plaintiffs,)	
)	
v.)	C. A. No. N20C-
)	
TARGET CORPORATION,)	JURY TRIAL DEMANDED
a foreign corporation,)	
)	
Defendant.)	

PLAINTIFFS' ANSWERS TO FORM 30 INTERROGATORIES

1. Give the name and present or last known residential and employment address and telephone number of each eyewitness to the incident, which is the subject of the litigation.

- A. (a) Elizabeth N. Ochefu
 32 Leena Lane
 Smyrna, DE 19977
- (b) Unidentified personnel from
 Target
 148 John Hunn Brown Road
 Dover, DE 19901

2. Give the name and present or last known residential and employment address and telephone number of each person who has knowledge of the facts relating to the litigation.

- A. In addition to those persons listed in Answer No. 1 above:
- (a) Hassan Ochefu
 32 Leena Lane
 Smyrna, DE 19977
- (b) Kent General Hospital
 21 West Clarke Avenue
 Milford, DE 19963
 (302) 744-7121

- (c) Express Care
300 Jimmy Drive, Suite 100
Smyrna, DE 19977
(302) 389-6631
- (d) Premier Physical Therapy & Sports Performance
642 South Queen Street, Suite 101
Dover, DE 19904
(302) 724-6344
- (e) First State Orthopaedics
100 South Main Street, Suite 300
Smyrna, DE 19977
(302) 653-5100
- (f) First State Imaging
240 Beiser Blvd., Suite 201C
Dover, DE 19904
(302) 356-1763

3. Give the names of all persons who have been interviewed in connection with the above litigation, including the names and present or last known residential and employment addresses and telephone numbers of the person who made said interviews and the names and present or last known residential and employment addresses and telephone numbers of persons who have the original and copies of the interview.

A. None at this time.

4. Identify all photographs, diagrams or other representations made in connection with the matter in litigation, giving the name and present or last known residential and employment address and telephone number of the person having the original and copies thereof.

A. None at this time.

5. Give the name, professional address and telephone number of all expert witnesses presently retained by the party together with the dates of any written opinions prepared

by said expert. If an expert is not presently retained, described by type the experts whom the party expects to retain in connection with the litigation.

A. No experts retained at present but Plaintiffs expect to retain medical experts.

6. Give a brief description of any insurance policy, including excess coverage,

that is or may be applicable to the litigation, including:

- (a) The name and address of all companies insuring the risk;
- (b) The policy number(s);
- (c) The type of insurance;
- (d) The amounts of primary, secondary and excess coverage.

A. (a) Sedgwick CMS;

- (b) Claim No. 000459716G-0001;
- (c) Liability;
- (d) Unknown.

7. Give the name, professional address, and telephone number of all physicians, chiropractors, psychologists, and physical therapist that have examined or treated you at any time during the ten-year period immediately prior to the date of the incident at issue in this litigation.

A. (a) Becky A. Souder, D.O.
Paoli Hospital
MOB 3, Suite 330
225 W. Lancaster Avenue
Paoli, PA 19301
(610) 786-3200

(b) Andrew S. Frankel, M.D.
Premier Orthopaedics
780 Lincoln Highway
Exton, PA 19341
(610) 873-1188

- (c) Robert A. Ruggiero, Jr., M.D.
Premier Orthopaedics
266 Lancaster Avenue, #200
Malvern, PA 19355
(610) 644-6900
- (d) Lauren A. Rome, M.D.
Pulmonology Associates
255 W. Lancaster Avenue, Suite 124
Paoli, PA 19301
(610) 648-0553
- (e) Jennifer C. Gilbert, D.O.
MOB 2, Suite 227
255 W. Lancaster Avenue
Paoli, PA 19301
(610) 889-9550
- (f) Xiaomang B. Stickles, M.D.
Lankenau Medical Office Bldg., Suite 661
100 E. Lancaster Avenue
Wynnewood, PA 19096
(610) 560-8940

WEIK, NITSCHE & DOUGHERTY, LLC

/s/ Gary S. Nitsche

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FILING IN COMPLIANCE WITH SUPERIOR COURT RULE 3(h)

In compliance with Superior Court Civil Rule 3(h), Plaintiffs attach the following documentation:

- (i) Answers to Form 30 Interrogatories;
- (ii) Due to the volume of documentary evidence gathered in this case, it is impractical to attach photocopies of all documents to the Complaint. Copies of all documents discoverable under this rule will be forwarded to the attorney for the Defendant once an appearance is made by Defendant's counsel and a written request for these documents is made.

WEIK, NITSCHE & DOUGHERTY, LLC

/s/ Gary S. Nitsche

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